

## HARVEY FISHBEIN

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October 15, 2024

**VIA ECF & VIA EMAIL**

Hon. Richard J. Sullivan  
United States Circuit Judge  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Tobias Paulino  
18 CR 148 (RJS)**

Dear Judge Sullivan:

I represent Tobias Paulino, having been appointed by Your Honor to represent him on a violation of supervised release in February 2023. At sentencing in that matter on August 17, 2023, the Court continued Mr. Paulino on supervised release, which is presently scheduled to conclude on October 27, 2025.

For the reasons detailed below, and with Probation's consent, I write to respectfully request that the Court grant Mr. Paulino early termination of his supervised release.

Attached for the Court's convenience is the transcript of August 17, 2023 proceedings wherein the Court reviewed in detail the history of this matter. At that time, the parties jointly recommended to the Court that supervised release be continued, to which the Court agreed. In addition, Your Honor suggested that, if in a year's time Mr. Paulino continued his excellent compliance and law-abiding efforts, the Court might entertain an application for early termination. I respectfully suggest that time has come.

I have spoken with USPO Washington Herrera who informs me that Mr. Paulino remains in full compliance and that USPO Herrera consents to early termination. He confirmed that Mr. Paulino continues to be employed and has successfully completed his counseling programs.

Critically, there have been no positive drug tests. I have also contacted AUSA Andrew Jones and he informs me that the Government defers to Probation on this issue.

Accordingly, I respectfully request that the Court enter an Order granting early termination of supervised release for Mr. Paulino.

Respectfully Requested,

/s/  
Harvey Fishbein

cc: USPO Washington Rivera (by email)

IT IS HEREBY ORDERED THAT the parties shall appear on November 25, 2024 at 9:30 a.m. in Courtroom 21C of the Daniel Patrick Moynihan Courthouse for a status conference.

**SO ORDERED:**   
Dated: 10/29/24 RICHARD J. SULLIVAN  
U.S.C.J., Sitting by Designation